

EXHIBIT 2

In the Matter Of:

THOMSON REUTERS vs

ROSS INTELLIGENCE

JIMOH OVBIAGELE

April 12, 2022



1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF DELAWARE

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4 _____

5 THOMSON REUTERS ENTERPRISE)

6 CENTRE GMBH and WEST)

7 PUBLISHING CORPORATION,)

8 Plaintiffs and) C.A. No. 20-613

9 Counterdefendants) (LPS)

10 v.)

11 ROSS INTELLIGENCE, INC.,) HIGHLY CONFIDENTIAL

12 Defendant and)

13 Counterclaimant.)

14 _____)

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16

17 --- This is the transcript of the videotaped
18 Deposition of, JIMOH OVBIAGELE, taken at the
19 offices of Regus - Toronto Airport Corporate
20 Centre, Mississauga, Ontario, Canada, on the
21 12th day of April, 2022.

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23

24 REPORTED BY: Helen Martineau, CSR

25 VIDEOGRAPHER: Bruno Silva

1 A P P E A R A N C E S:

2 FOR THE PLAINTIFF:

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NO. /	DESCRIPTION	PAGE
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2	Document entitled "Statement of	115
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	581.	
3	Slack conversation, dated	147
	June 15th, 2017; Bates numbered	
	ROSS-009637399 to 7400.	
4	Email exchange, top email from	150
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	September 15th, 2017; Bates	
	numbered ROSS-009558474 to 8475.	
5	Email exchange, top email from	175
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	4, 2017; Bates numbered	
	ROSS-003537612 to 7613.	

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7	Email exchange, top email from Thomas Hamilton to Shazina Razeen, dated September 20, 2015; Bates numbered ROSS-003610162 to 0165.	199
8	Slack Notifications from the ROSS Inc. team for February 16, 2015; Bates numbered ROSS-003391075.	203
9	Email from Asana to Jimoh Ovbiagele, dated June 6, 2015, re: Updated tasks; Bates numbered ROSS-009585472.	207
10	Email exchange, top email from Thomas Hamilton to Andre Arruda, and others, dated September 25th, 2015; Bates numbered ROSS-003389728 to 9730.	213

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PRODUCTION REQUESTS

PRODUCTION REQUESTS are denoted by P/R
and are found on the following Page/Line:

94/12;

100/23;

109/14;

232/17.

1 -- Upon commencing at 9:20 a.m.

2 THE VIDEOGRAPHER: Good morning. We
3 are going on the record at 9:20 a.m. on
4 April 12th, 2022. This is media unit number one
5 of the video deposition of Jimoh Ovbiagele in
6 the matter of Thomson Reuters Enterprise Centre
7 GmbH et al. versus ROSS Intelligence Inc., case
8 number CA-20-613(LPS), filed in the United
9 States District Court of Delaware.

10 This deposition is being held at
11 Regus, Toronto Airport Corporate Centre, 2425
12 Matheson, 8th Floor, Mississauga, Ontario, L4W
13 5K4.

14 My name is Bruno Silva, CLVS, on
15 behalf of Philadelphia, and I am a videographer.
16 The court reporter is Helen Martineau on behalf
17 of Philadelphia.

18 Will counsel please introduce
19 yourselves followed by the court reporter
20 swearing in the witness.

21 MR. SIMMONS: Joshua Simmons from
22 Kirkland & Ellis, and with me is Eric Loverro.
23 We represent the plaintiffs in this matter.

24 MR. PARKER: And I'm Warrington Parker
25 and with me is Jacob Canter and we represent the

1 defendant.

2 THE VIDEOGRAPHER: Would the court
3 reporter please swear in the witness.

4 JIMOH OVBIAGELE: AFFIRMED.

5 CROSS-EXAMINATION BY MR. SIMMONS:

6 Q. Good morning, from Ovbiagele.
7 Would you please state your address for the
8 record?

9 A. 365 Adelaide Street East,
10 Toronto, Ontario, M5A 1N3, was my last address.
11 Currently I do not have a permanent address.

12 Q. Are you staying somewhere at the
13 moment?

14 A. Yes.

15 Q. With whom are you currently
16 residing?

17 A. A friend.

18 Q. Is that friend located in
19 Toronto?

20 A. Yes.

21 Q. Do you intend to stay in Toronto
22 for the foreseeable future?

23 A. I am currently travelling.

24 Q. When you say you're "travelling",
25 is that around Canada, is that other countries?

1 BY MR. SIMMONS:

2 Q. In what way did you want to make
3 legal research more efficient?

4 A. I wanted to minimize the amount
5 of cases that lawyers need to read to complete
6 their research.

7 Q. Were you familiar with cases
8 being -- strike that.

9 Were you familiar with case research
10 prior to forming ROSS?

11 MR. PARKER: Object as to form.

12 THE WITNESS: Yes.

13 BY MR. SIMMONS:

14 Q. How were you familiar with case
15 research?

16 A. Google and speaking to lawyers.

17 Q. What got you interested in
18 improving legal research?

19 A. The cost of legal services and
20 their inaccessibility.

21 Q. What experience did you have that
22 involved the cost of legal services and their
23 inaccessibility?

24 A. My mom wanted to separate from my
25 dad, but she couldn't afford a family lawyer.

1 artificial intelligence is not useful for
2 distinguishing the technology that we want to
3 introduce into the legal research domain.

4 BY MR. SIMMONS:

5 Q. What technology was ROSS
6 introducing into the legal research domain?

7 A. Ultimately we wanted to introduce
8 deep learning techniques.

9 Q. What are "deep learning
10 techniques"?

11 A. Deep learning techniques use a
12 machine learning model that's inspired by the
13 human brain called "deep neural networks".

14 Q. What's a machine learning model?

15 A. A general explanation is that
16 machine learning models learn how to do a task
17 by analyzing data.

18 Q. What are deep learning networks?

19 MR. PARKER: Object as to form.

20 THE WITNESS: Deep learning networks
21 are machine learning models that are composed of
22 software neurons that are connected together.
23 And when you pass data through them, they create
24 logic networks that can take in data and output
25 something -- produce a desired output on the

1 other side.

2 BY MR. SIMMONS:

3 Q. When you say "data", what is that
4 composed of?

5 MR. PARKER: Object as to form.

6 THE WITNESS: It depends on the
7 context.

8 BY MR. SIMMONS:

9 Q. Would I be correct in saying that
10 data in the context of machine learning models
11 would include inputs and outputs?

12 MR. PARKER: Object as to form.

13 THE WITNESS: Yes. There's input data
14 and there's output data.

15 BY MR. SIMMONS:

16 Q. And the input data models the
17 kind of inputs a user might give to the machine
18 learning system, right?

19 MR. PARKER: Object as to form.

20 THE WITNESS: During the training
21 phase, there's the input data, which is the
22 expected input to the machine learning model
23 when it's in ultimate use, and then it produces
24 an output. And then you have your expected
25 output, which you use to assess the actual

1 "negotiating"?

2 Q. Well, is this document an
3 agreement between ROSS Intelligence and
4 LegalEase Solutions?

5 A. Yes.

6 Q. Were you involved in the decision
7 to enter into this agreement with LegalEase?

8 A. Yes.

9 Q. Did you review this document in
10 preparation for your deposition today?

11 A. Yes.

12 Q. This is the agreement under which
13 LegalEase provided ROSS with the ROSS bulk
14 memos, correct?

15 MR. PARKER: Object as to form.

16 THE WITNESS: Yes.

17 BY MR. SIMMONS:

18 Q. And if you go to the fourth
19 paragraph, it's entitled "term". Do you see
20 that?

21 A. Yes.

22 Q. And subject to the termination
23 provisions of the agreement, the term for this
24 statement of work was a period of three months,
25 commencing on September 19th, 2017, and expiring

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1 THE WITNESS: I don't remember
2 exactly, but there should be a document showing
3 that.

4 BY MR. SIMMONS:

5 Q. Was the practice area information
6 used by ROSS in its models?

7 MR. PARKER: Object as to form.

8 THE WITNESS: The practice areas were
9 not used in models that were part of the product
10 that was used by customers.

11 BY MR. SIMMONS:

12 Q. That wasn't my question. My
13 question was whether you used them in any
14 models.

15 MR. PARKER: Object as to form.

16 THE WITNESS: They were not used in
17 any model.

18 BY MR. SIMMONS:

19 Q. So why were you having LegalEase
20 provide them if you never used them in any model
21 ever?

22 A. This was an expensive project.
23 We wanted to make sure that the project could be
24 used for future purposes. At the time, we
25 thought we would use them. We didn't end up

1 using them.

2 Q. Did ROSS use the practice area
3 labels in other ways?

4 MR. PARKER: Object as to form.

5 THE WITNESS: We did not.

6 BY MR. SIMMONS:

7 Q. So LegalEase provided you memos
8 that contained information about the cases in
9 the form of practice areas and ROSS never used
10 that information in any way, is that your
11 testimony?

12 MR. PARKER: Object as to form.

13 THE WITNESS: As I understand, we did
14 not use the practice areas in the Bulk Memo
15 project.

16 BY MR. SIMMONS:

17 Q. Just to be clear, your testimony
18 was that you didn't use them in the Bulk Memo
19 project. But my question is, LegalEase provided
20 you memos that contained information about the
21 cases in the form of practice areas. Is it your
22 testimony that ROSS never used that information
23 in any way?

24 MR. PARKER: Object as to form?

25 THE WITNESS: In this statement of

1 work that says:

2 "Contractor shall also label
3 which legal practice area each Quote
4 falls under."

5 As I understand, we did not use these
6 practice areas in any way.

7 BY MR. SIMMONS:

8 Q. Do you know where the practice
9 areas -- strike that.

10 Do you know how the practice areas
11 were determined?

12 MR. PARKER: Object as to form.

13 THE WITNESS: I do not, but there may
14 be a document that discusses this.

15 BY MR. SIMMONS:

16 Q. The only way that you would have
17 information about how the practice areas were
18 determined is by reviewing documents produced by
19 ROSS, is that your testimony?

20 MR. PARKER: Object as to form.

21 THE WITNESS: Can you repeat the
22 question?

23 BY MR. SIMMONS:

24 Q. I'll ask the reporter to read it
25 back.

REPORTER'S CERTIFICATE

I, HELEN MARTINEAU, CSR, Certified
Shorthand Reporter, certify;

That the foregoing proceedings were
taken before me at the time and place therein
set forth, at which time the witness was put
under oath by me;

That the testimony of the witness and
all objections made at the time of the
examination were recorded stenographically by me
and were thereafter transcribed;

That the foregoing is a true and
accurate transcript of my shorthand notes so
taken. Dated this 19th day of April, 2022.



PER: HELEN MARTINEAU

CERTIFIED SHORTHAND REPORTER

Signature and Errata Sheet
April 12, 2022 Deposition of Jimoh Ovbiagele
Thomson Reuters Enterprise Centre GMBH and West Publishing Corporation v. ROSS Intelligence Inc.

I, Jimoh Ovbiagele, have reviewed the attached transcript of my April 12, 2022 deposition testimony, and certify, pursuant to 28 U.S.C. § 1746 that the attached transcript is my true and correct testimony during that deposition, subject to the corrections shown below.

Page/Line	Now Reads	Correction	Reason
15:14	did	didn't	Transcription error
15:22	Ross	ROSS	Correct spelling
21:02	"sic"	Delete "sic"	Transcription error
21:24	"about"	"about what"	Transcription error
23:18	and	of	Transcription error
26:08	"your"	Delete "your"	Clarification
28:05	Ross	ROSS	Correct spelling
32:01	Hayden	Heijden	Correct spelling
32:05	Hayden	Heijden	Correct spelling
32:08	Hayden	Heijden	Correct spelling
32:11	Hayden	Heijden	Correct spelling
32:16	Ross	ROSS	Correct spelling
32:23	Ross	ROSS	Correct spelling
35:19	Ross	ROSS	Correct spelling
52:25	That	where	Clarification
55:09	Ross	ROSS	Correct spelling
56:02	Ross	ROSS	Correct spelling
61:24	starts	start	Transcription error

81:09	Ross	ROSS	Correct spelling
109:14-17	<i>Bolded text</i>	<i>Text should not be bold</i>	Bold text indicates deponent speaking but that is not the case
157:03	Thomas	Tomas	Correct spelling
215:10	if	is	Transcription error

Executed on May 25, 2022, at 579 Transversal 1a 501, Bogotá, Bogotá 110231, Colombia.


